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March 8, 2021

**VIA EPA FOIA ONLINE PORTAL**

National Freedom of Information Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460

**RE:     FOIA REQUEST**

Dear HQ FOIA Staff:

Pursuant to the Freedom of Information Act ("FOIA"), as amended, 5 U.S.C. Section 552, and the Environmental Protection Agency ("EPA" or "Agency") rules issued thereunder, 40 C.F.R. Part 2, I am requesting copies of the Confidential Statements of Formula and information contained in the registration jacket for EPA Registration No: 83558-38 and EPA Registration No: 88338-37 ("EPA Registration" or collectively the "EPA Registrations").

My request is based on the following facts:

- (1) As the new registrant for the EPA Registrations, Makhteshim Agan of North America, Inc., as agent for ADAMA Celsius Property B.V., Amsterdam (NL) (ADAMA), is entitled to copies of all confidential information in the registration jacket.
- (2) ADAMA is the owner of EPA Registration 88338-37 which Syngenta transferred to MANA on July 24, 2019.
- (3) On July 24, 2019, Syngenta also transferred EPA Registration No. 83558-38 to MANA for the technical product containing the crop only uses. Syngenta maintains the non-crop uses for pymetrozine under a separate technical registration.
- (4) On July 26, 2019, Syngenta corrected the July 24, 2019 letters to reflect the transfer of the technical registrations to ADAMA CELSIUS PROPERTY B.V., AMSTERDAM (NL).

**ADAMA**

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If for any reason you determine that portions of the requested information are exempt from disclosure under FOIA, please delete the allegedly exempt material, inform me of the basis for the claimed exemption, and furnish me with copies of those portions of the document that you determine not to be exempt. My consent to such deletion at this time is designed to facilitate your prompt response and in no way waives my right to appeal any determination that you may make regarding the applicability of any FOIA exemptions to the requested documents and information.

If you determine that any complete documents are exempt from disclosure, please provide me with the basis for that conclusion.

I request that you provide me with accurate copies of the information requested. I agree to pay reasonable search and reproduction costs. If these costs exceed \$250.00, however, I request that you notify me before reproducing the documents.


Pursuant to FOIA, I understand that EPA will respond with an initial determination regarding this request within 20 working days of your receipt of this letter. Should there be any need to delay providing records beyond that time, we request that responsive records be provided as they are identified, on a rolling basis, and that the Agency not await compilation of all responsive records before providing those that have been identified and need not be subject to further review to comply with legal requirements.

Please use the following address for any correspondence or responses:

J. Mark Hough  
Makhteshim Agan of North America, Inc. d/b/a Adama  
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If you have any questions about this request or require further information, please email me at [mark.hough@adama.com](mailto:mark.hough@adama.com) or call me at 919-256-5950. Thank you in advance for your assistance.

Sincerely,



J. Mark Hough